



POLITICAL POLICY GUIDELINES

(WCPO-TV, CINCINNATI, OH)

The following information is provided as a guide to station **WCPO-TV's** political sales practices. Should you require further clarification or assistance, please contact:

Darrell Calloway, Director of Sales	513-852-4050
Dave Lombardo, Regional Sales Manager	202-408-2713
Brad Wagner, National Sales Manager	513-852-4023
	513-258-7422

ELECTION DETAILS

Primary Election	OH Tuesday, March 6, 2012
Political Window:	KY Tuesday, May 22, 2012
Election	

General Election	Tuesday, November 6, 2012
Political Window:	60 days prior to General
Election	

SPOT PRICING FOR CANDIDATE "USES"

Candidate "uses" are ads that include a positive appearance, by voice or picture, of a legally qualified political candidate. During the 45 days preceding a primary election, and during the 60 days preceding a general or special election, only candidates enjoy the benefit of being able to purchase time for such "uses" at the lowest unit charge offered any commercial advertiser for an ad of the same class, of the same length, and for the same period. The current lowest unit charge prices for the various classes of spots offered by the station are attached.

Prices for commercial advertisers' spots are developed through negotiation and vary based upon demand and the level of preemption protection sought by the advertiser. Candidates likewise may negotiate to purchase spots at any rate available to commercial advertisers, but the ultimate charge for any candidate "use" will not exceed the lowest price paid by any other advertiser 1.) for the same class of time, 2.) of the same length and 3.) for the same dates, which actually runs during the appropriate advertising window. In the event that the price initially paid by a candidate should exceed the price paid by another advertiser for a spot meeting these three conditions, a makegood or a rebate of the difference will be promptly provided.

It is the station's policy, however, not to preempt a candidate's "use" in a period until after all commercial spots of the same class and the same length – including those purchased at a higher rate – have been preempted. This policy generally negates any incentive for candidates to negotiate higher prices than those offered in the attached rate guide.

Lowest unit charge prices are established on a weekly basis. This rate guide will be updated on an as needed basis*. Please check the effective date to insure that the most current information has been provided. All sales are made subject to confirmation of availability.

TYPES OF SPOTS AVAILABLE

All classes of time and discount privileges available to commercial advertisers are listed below and are available to qualified political candidates:

NON-PREEMPTIBLE (P1): spots that are 1.) scheduled to air at the station's discretion in the particular program, time period, daypart or day specified by the advertisers, 2.) that will not be preempted in favor of any other spot, and 3.) that will air as scheduled absent unforeseen program changes or technical difficulties.

PREEMPTIBLE WITH NOTICE (P2): spots that are 1.) scheduled to air at the station's discretion the particular program, time period, daypart or day specified by the advertiser, but 2.) are preemptible with **1 week** advance notice. Based on our past experience, we estimate that such spots have a low likelihood of being preempted. The station will give its best good faith estimate of the likelihood of preemption at the time of the particular request.

PREEMPTIBLE WITH NOTICE – 3 DAYS (P3): spots that are 1.) scheduled to air at the station's discretion the particular program, time period, daypart or day specified by the advertiser, but 2.) are preemptible with **3 days** advance notice. Based on our past experience, we estimate that such spots have a low likelihood of being preempted. The station will give its best good faith estimate of the likelihood of preemption at the time of the particular request.

IMMEDIATELY PREEMPTIBLE (P8): spots that are 1.) scheduled to air at the station's discretion in the particular program, time period, daypart or day specified by the advertiser, but 2.) are immediately preemptible. The likelihood of such spots being preempted is difficult to predict, but the risk of preemption is always substantial and, depending on market condition, may be very high. The station will give its best good faith estimate of the likelihood of preemption at the time of the particular request.

In addition to the classes of time described above that are routinely offered to commercial advertisers, the station on occasion offers:

- "ROS" spots that are offered in daily or weekly rotations across multiple programs and scheduled only as inventory permits. These are the first spots to be preempted, and makegoods are not offered for such spots on a time-sensitive basis.
- "Fixed" spots that are A) non-preemptible and B) scheduled to air in a particular program at a specific time or break.
- Further, the station from time to time may participate in an "unwired network" whereby the station will air spots sold by a national sales representative who has offered advertisers broad geographic coverage at special multi-station rates.
- "Audience Guarantee" agreements based on previously agreed upon terms and conditions.

Candidates interested in discussing the availability of any of these type offerings should contact the station, rates and conditions will be made available upon request.

REASONABLE ACCESS

All Federal Candidates will receive access to WCPO's programming for the purchase of "reasonable amounts" of advertising time. WCPO reserves the right to accept or deny all state, local or 3rd party political advertising, and/or limit the amount of inventory made available to these categories. Access to WCPO's commercial airtime for any of these candidates or parties will be made on a per race basis.

RATES

All rates quoted on the attached rate card are for (:30) thirty-second commercial announcements.

- Sixty-second (:60) announcements are double the :30-second rate
- Fifteen-second (:15) commercial announcements are 65% of 30-second rate rounded up to the next highest one dollar increment.
- Ten-second (:10) commercial announcements are 50% of 30-second rate rounded up to the next highest one dollar increment.

WCPO-TV reserves the right to revise (increase/decrease) the rates charged during the election period as they relate to ordinary business practice.

Please be advised that 10-second spots and 15-second spots are **highly preemptible** in time periods which do not contain fixed :10 or 15-second positions; therefore, the station does not offer non-preemptible class status to any announcement less than 30 seconds in duration outside of these natural positions. Please contact station for further information.

Program length commercials will be sold subject to availability. Available time periods will be provided upon request.

Direct response commercial time is available, is highly preemptible and has no guarantee of running at all. Qualifying unit lengths (:30's :60's :90's and :120's) with respective rates will be provided upon request. Advertiser must meet the criteria of a "Direct Response" client (available upon request). No makegoods are offered to spots preempted from Direct Response schedules.

POLITICAL SPONSORSHIP IDENTIFICATION

In order to give clarification as to what constitutes adequate sponsor identification for all political advertising (both spot and program), WCPO-TV has adopted the following requirements for all political advertising as set forth in various Federal Communication Commission rulings.

NOTE: No abbreviations are allowed and full committee name must appear.

1. It is required that the name of the organization purchasing the airtime be clearly identified and preceded by the words: **“Paid For By . . .”** or **“Sponsored By . . .”**.

Example: *“Paid for by the John Doe for Congress Committee”*
 “Sponsored by the John Doe for Congress Committee”

2. These disclosures must be both aural and visual OR visual only so long as the height of the letters are at least 20 scan lines and visible for at least a 4-second duration. This FCC ruling is based on the need for sponsor identification to be clearly and quickly understandable to the general viewing public. In this respect, either disclosure method chosen must have the visual portion contain large enough print and be shown for a long enough period of time to be readable. The aural disclosure, incorporated, should be distinctly spoken.
3. Please note that a P.O. Box is not a legal residence or business address and is not accepted as the address of a party, candidate or campaign headquarters.
4. Adequate sponsor identification shall be made at both the beginning and end of all political programs which exceed 5 minutes duration. Programs of five minutes or less duration need only contain one sponsor identification disclosure and this may appear at the beginning or the conclusion of the program.
5. Third party candidate support groups are those groups or persons who are not the Candidate nor are the Official Committee or Agent of the Candidate. As defined, such third party groups are not guaranteed access to station time, nor is the station obligated to offer a lowest unit rate. Further, regardless of the spots being for a Federal or State office candidate, a full disclaimer is required as outlined in items (1), (2), and (3) of this section with the exception that all such spots must state whether the spot **IS** or **IS NOT** authorized by the candidate or the candidates official committee.

STANDARDS FOR POLITICAL SALES PRACTICES

MAKEGOODS

The station will use its best efforts to provide “makegood” spots prior to the election for any immediately preemptible candidate “use” spots that are preempted. Although the station’s policy is to offer all candidates makegoods before the election, we cannot guarantee to any advertiser that the makegoods can be provided in the program time period or rotation originally ordered. If inventory constraints preclude such identical scheduling, we will offer makegoods of equivalent value. If these are not acceptable to the advertiser, the station will provide credits or refunds for preempted spots.

ROTATIONS

The rotations listed on stations rate guide describe those offered to commercial advertisers. Variations of these rotations are routinely developed based upon specific advertiser requests. A list of any additional rotations will be made available upon request.

ADVANCE PAYMENT POLICY

The station requires that payment for political spots be made prior to the start of the schedule. Payment should be made in the form of cash, credit card, cashiers check, certified check.

WCPO-TV PRODUCTION

Payment for other **WCPO-TV** services i.e. production, dubs, etc., is required prior to services rendered. Production rates are available upon request. The availability of **WCPO-TV** production facilities are not guaranteed. It is therefore suggested that requests for production time be booked in advance through **WCPO-TV’s** Sales Management.

COMMERCIAL MATERIAL

The station requests that all on-air material be in the station at least two (2) business days prior to the first potential air date. The special nature of political ads require special viewing to assure proper disclaimers are present. Federal law permits stations to add, within the advertisement, any necessary disclaimers that, by airing otherwise, may find the station in violation of FCC rules. Production charges to the candidate may be incurred.

SIGNED DOCUMENTS

All pertinent paperwork (orders, completed political agreement forms, etc.) and documents that require candidate or candidate agent signature must be signed and in the station no later than the close of business on the working day prior to the first potential air date. Political record of request form for avails should be completed and forwarded to the station for placement in the political file.

LOGS

Logs close at 12pm (Noon) on the normal business day prior to actual air date (i.e., Tuesday's log closes at 12pm on Monday). The exception relates to weekend log schedules and holidays.

<u>DAY</u>	<u>LOG CLOSES</u>	
Friday	12:00n	Thursday
Saturday	12:00n	Thursday
Sunday	12:00n	Friday
Monday	12:00n	Friday

Holiday log schedules are available upon request.

POLITICAL FILE

WCPO-TV maintains a current political file and it is available for inspection by going to the FCC website, (<https://stations.fcc.gov>), or at the station during regular business hours, Monday-Friday 9am-5pm, excluding holidays. WCPO has also posted a link to its Commission online public file on its home page @ WCPO.com. No political file information will be made available via the telephone. Copies of political files kept at the station will be made for \$.25 per page. Copies will not be mailed. Due to the nature of day-to-day business commitments, an appointment should be scheduled in order to view the files in a timely fashion.

REBATES

If at any time **WCPO-TV** determines an error has been made and a lower rate is warranted, the agency/client will be contacted immediately. The overcharge amount either will be returned to agency/client or added to schedule to purchase additional spots per agency/client directive.

PROGRAMMING

The station will provide reasonable access to its facilities for all legally qualified federal candidates. Candidates are invited to make specific program requests, but the station reserves the right to make the ultimate determination with respect to the amount of time offered and the placement of any candidate advertising. All stated programs are subject to change without notice.

WCPO-TV reserves the right to schedule competitive political advertisers back-to-back if necessary.

Political announcements will air on Election Day ending at the end of our 5:00pm newscast.

CANCELLATION POLICY

WCPO requests a 2 week prior notice on all cancellations.

WCPO-TV STATION PROFILE

MAILING ADDRESS:

**WCPO-TV
1720 GILBERT AVE.
CINCINNATI, OH 45202
(513) 721-9900**

NETWORK AFFILIATION: ABC

NATIONAL SALES REPRESENTATION:

Dave Lombardo

The E.W. Scripps Company
1090 Vernon Avenue, NW
Suite 1000
Washington, DC 20005

KEY PERSONNEL:

Darrell Calloway, Director of Sales
Brad Wagner, National Sales Mgr
Christy Gamel, Traffic Coordinator

513-852-4050
513-852-4023
513-852-4027

PRODUCTION SPECIFICATIONS:

Programs
Commercials

DVC Pro, DGS, FTP
DVC Pro, DGS, FTP

STATION ACCEPTS and/or COMPLIES WITH THE FOLLOWING:

- Political Action Committee Ads
- Political Ads Within News Programs
- Political Issue Ads Within News Programs
- Release of Competitive Information to Other Candidates

STATION DOES NOT ACCEPT and/or REQUIRE THE FOLLOWING:

- Political Ads After 1pm on Election Day
- No State Tax Required on Political Advertising